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6  
7 Attorney for RAYCHELLE IVORY

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAYCHELLE IVORY,

15 Defendant.  
16

Case No. 2:15-cr-017-JAD-VCF

**STIPULATION TO EXTEND**  
**OBJECTIONS TO REPORT &**  
**RECOMMENDATION #54**  
(First Request)

17  
18 IT IS HEARBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
19 United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney,  
20 counsel for the United States of America, and Rene L. Valladares, Federal Public  
21 Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for  
22 RAYCHELLE IVORY, that the Objections to Report & Recommendation deadline CR#54  
23 currently due on October 2, 2015 be extended by thirty (30) days to and including  
24 November 2, 2015.

25 The Stipulation is entered into for the following reasons:

- 26 1. The client is in custody and does not oppose the continuance.

1           2.     Defense counsel only recently returned to the jurisdiction and needs  
2 additional time to review the recommendation thoroughly prior to filing her objections.

3           3.     The additional time requested herein is not sought for purposes of delay, but  
4 merely to allow counsel for the defendant sufficient time to prepare and file her objections.

5           4.     Denial of this request for continuance would deny counsel for the defendant  
6 sufficient time to effectively present her objections, taking into account the exercise of  
7 due diligence.

8           5.     Additionally, denial of this request for continuance could result in a  
9 miscarriage of justice.

10          6.     This is the First stipulation to extend filed herein.

11  
12 DATED: September 22, 2015

13  
14 RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

15  
16 */s/Monique Kirtley*  
By \_\_\_\_\_  
17 MONIQUE KIRTLEY  
Assistant Federal Public Defender

*/s/ Phillip N. Smith, Jr.*  
By \_\_\_\_\_  
18 PHILLIP N. SMITH, JR.  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYCHELLE IVORY,

Defendant.

Case No. 2:15-cr-017-JAD-VCF

**ORDER**

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that the best interest of justice is served by the granting of the continuance.

IT IS THEREFORE ORDERED that the Objections to Report & Recommendation deadline CR#54 currently due on October 2, 2015 be extended by thirty (30) days to and including November 2, 2015.

DATED this 25th day of September, 2015.

  
UNITED STATES DISTRICT JUDGE